

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**DOUGLAS HANDSHOE**

**PLAINTIFF**

**VERSUS**

**CIVIL ACTION NO: 1:13CV254 HSO-RHW**

**JOHN DOE(S) AKA "RANDALL CAJUN"**

**DEFENDANTS**

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**MOTION FOR TIME TO REPLY TO MOTION TO REMAND**

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COME NOW Defendants, Charles Leary ("Leary") and Vaughan Perret (Perret"), and file this their Motion for Time to reply to Motion to Remand filed by Plaintiff, Douglas Handshoe, and in support would show that show that Perret and Leary's reply is due September 6, 2013. The Court entered its Order [Docket No. 14] which stays these proceedings except for remand related discovery pending the decision of Plaintiff's Motion to Remand.

Accordingly, Leary and Perret move for forty-five (45) days time from September 6, 2013 in which to conduct remand related discovery.

RESPECTFULLY SUBMITTED this the 29<sup>th</sup> day of August, 2013.

CHARLES LEARY and VAUGHAN  
PERRET

By: s/ Henry Laird  
Henry Laird, MS Bar No. 1774

**CERTIFICATE OF SERVICE**

I, Henry Laird, of the law firm of Jones Walker LLP do hereby certify that I have sent a true and correct copy of the foregoing Motion to Dismiss by using the ECF system to the following:

Douglas Handhoe  
214 Corinth Drive  
Bay St. Louis, Mississippi 39520  
VIA UNITED STATES MAIL AND EMAIL: [earning04@gmail.com](mailto:earning04@gmail.com)

This the 29<sup>th</sup> day of August, 2013.

s/ Henry Laird  
Henry Laird

Henry Laird (MSB No. 1774)  
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